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March 27, 2013

Ms. Nicole Miller
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00004036
RE: Amended July Monthly Report (6/1/2012-6/30/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to independent expenditures that were disclosed on Schedule E but not disclosed as debt on Schedule D of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

On a 48-Hour Notice, filed on June 27, 2012, the committee disclosed an independent expenditure for an online advertising buy opposing Mitt Romney. These online ads were estimated to cost \$10,000 and began running on June 25th. On the Amended July Monthly Report, the committee disclosed that \$2,550 of the estimated \$10,000 cost was paid to Google for running these ads (\$550 on 6/27, \$1,000 on 6/29 and \$1,000 on 6/30). The committee used the description "'Partial Payment for Online Ads As Disclosed on 6/27 48-HR Notice.'" The \$2,550 paid to Google is not debt because Google was partially paid for these ads within a matter of days of their dissemination. The remaining \$7,450 in advertising that was not paid for during the same reporting period was disclosed as debt when it was added to Schedule D of the Amended July Monthly Report.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Counsel for SEIU COPE
cc: Eliseo Medina, Treasurer, SEIU COPE
